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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETER EGNER,

Defendant.



08-CV-01078-AF

Case No.

C08 1078 JPD

AFFIDAVIT OF GOOD CAUSE IN SUPPORT OF COMPLAINT

I, Elizabeth B. White, declare under penalty of perjury as follows:

1. I am the Deputy Director and Chief Historian of the Office of Special Investigations, Criminal Division, United States Department of Justice, and as such, have access to, and have personally reviewed, evidence reflecting Defendant Peter Egner's ("Defendant") wartime service and his subsequent immigration and naturalization. It is with this knowledge that I declare that the following facts concerning Defendant are correct.

2. Defendant served during World War II in the Security Police and Security Service ("SPSS") of the Nazi SS and Police in German-occupied Belgrade, Serbia, from on or about April 28, 1941, until he was wounded on or about September 29, 1943.

3. During the period of Defendant's service, the Belgrade-based SPSS participated in the mass murder of more than 17,000 Serbian civilians, most of whom were killed solely because they were Jews, Gypsies, and/or were considered politically suspect by German occupation authorities. During the first approximately nine months of Defendant's service, the SPSS

operated as the Belgrade *Einsatzgruppe*, a special mobile unit of the German extermination program. The organization played a leading role in the Nazis' mass murder of 6,280 Jewish women and children (all of whom were inmates at Semlin concentration camp, under SPSS control, near Belgrade), who were systematically killed over a period of two months in early 1942 through asphyxiation with carbon monoxide exhaust in a specially designed mobile gas van. Their bodies were then interred in burial pits at Avala, the primary location for Belgrade-area executions and mass victim graves during World War II.

4. By his own admission to federal authorities during a February 2007 interview, Defendant, during his service in the SPSS, guarded prisoners as they were being transferred to Avala and also guarded prisoners as they were being transferred to Semlin.

5. As admitted during his February 2007 interview with federal authorities, Defendant, while serving in the SPSS, participated as an interpreter in interrogations of political prisoners.

6. Interrogations conducted by SPSS personnel sometimes involved severe torture, often followed by execution.

7. On or about March 6, 1960, Defendant entered the United States as an immigrant.

8. In November and December 1965, Defendant applied to become a United States citizen. On his Application to File Petition for Naturalization, Defendant falsely answered a question regarding his prior foreign military service and prior membership in any organizations. In his response, which he swore was true, Defendant omitted his SPSS service and instead listed "German Army" for the relevant time period. During his interview with a naturalization examiner, Defendant, while under oath, repeated this false statement, and made the additional false claim that he had served as an infantry sergeant in the German Army.

9. On or about January 20, 1966, Defendant was naturalized by the United States District Court of the District of Oregon and received Certificate of Naturalization No. 8858479.

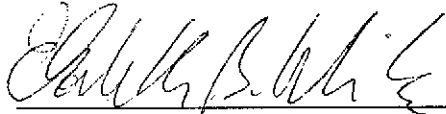
10. Upon information and belief, Defendant currently resides in the Western District of Washington.

11. There exists good cause for the institution of proceedings against Defendant to revoke his citizenship, pursuant to Section 340(a) of the Immigration and Nationality Act, 8 U.S.C. § 1451(a), because Defendant's United States' citizenship was illegally procured, and was procured by concealment of a material fact or willful misrepresentation.

DECLARATION IN LIEU OF JURAT

(28 U.S.C. § 1746)

I declare under penalty of perjury that the foregoing is true and correct.



Elizabeth B. White
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Dated: July 14, 2008